

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

UNITED STATES OF AMERICA,
Plaintiff,

v.

NELIDA DE JESUS ARNAU,
Defendant.

CRIM. NO. 97-191(CC)

**REQUEST FOR EARLY TERMINATION
OF SUPERVISED RELEASE TERM**

TO THE HONORABLE
CARMEN CEREZO
UNITED STATES DISTRICT JUDGE
FOR THE DISTRICT OF PUERTO RICO

COMES NOW the above-captioned defendant, NELIDA DE JESUS ARNAU, through her undersigned attorney and respectfully states the following:

1. Ms. De Jesus was sentenced by this Honorable Court to a 36-month term of imprisonment, followed by three years of supervised release, no fine, and a Special Monetary Assessment, which has been satisfied.

2. On March 16, 2004, Ms. De Jesus completed her term of imprisonment, and began her term of supervised release. During that term, she has reported as requested, she has submitted the required monthly financial reports, she has maintained employment during this time – mostly as a factory worker, and she has submitted proof of her steady employment to her probation officer. In short, Ms. De Jesus has been, for the past eighteen-plus months, in full compliance with the terms of her supervised release.

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3. Pursuant to 18 U.S.C. § 3583(e)(1), this Honorable Court can discharge a defendant after only one year of supervised release after considering, *inter alia*, the nature and circumstances of the offense and of the defendant, the need to effect adequate deterrence and the prevention of future criminal activity, and the defendant's need for education, vocational training, or treatment. Ms. De Jesus has proven herself able to rise above her past conduct and set a course far from criminal activity, devoting herself to being a productive member of society in another jurisdiction, far from the negative influences that had affected her here in Puerto Rico. She continues to thrive in a long-standing, and very positive, common-law relationship (her companion is presently a postman). She shows no indication of needing additional supervision, training, or treatment, but instead merits discharge, based upon the statutory factors listed above.

4. Because of Ms. De Jesus' steady and substantial compliance with all terms of supervision since her release from prison, it is respectfully requested that she receive the benefit of early termination of her supervised release term.

WHEREFORE, Ms. De Jesus respectfully requests that this Court order the early termination of her supervised release term.

I CERTIFY that on this same date a copy of this Motion was served electronically upon all attorneys of record, and by fax to the United States Probation Office in this District.

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RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, October 17, 2005.

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